

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

DAVID WILLIAM WOOD,
Plaintiff,

v.

Civil No. 3:15-cv-00594-MHL

CREDIT ONE BANK, N.A.,
Defendant.

**CONSENT MOTION FOR LEAVE TO
DESIGNATE SUPPLEMENTAL TRIAL EXHIBIT**

Defendant Credit One Bank, and with the consent of Plaintiff, moves the Court for leave to designate one additional exhibit for use at trial.

Pursuant to the Court's Pretrial Order (ECF No. 29) and subsequent amending Order (ECF No. 105), Credit One filed its Exhibit List in preparation for trial on November 22, 2017. (ECF No. 110.) However, this filing inadvertently omitted one exhibit, which Credit One now seeks the Court's leave to designate as Defendant's Proposed Exhibit No. 26 (Bates-labeled COB04160-COB04162). This document was produced by Credit One during discovery, but was mislaid during the transfer of the case from Credit One's previous counsel to the current counsel.

This supplemental designation will cause no prejudice to Plaintiff and, as noted above, Plaintiff has consented to the late designation. The short delay implicated by this additional designation will not affect either party's preparation for trial or the Court's ability to decide any objections to the parties' exhibits.

Credit One has also attached an updated list of its proposed trial exhibits that includes the proposed supplemental exhibit.

Dated: December 8, 2017

Respectfully submitted,

CREDIT ONE BANK

/s/

Bryan A. Fratkin (VSB No. 38933)
bfratkin@mcguirewoods.com
Heidi E. Siegmund (VSB No. 89569)
hsiegmund@mcguirewoods.com
McGuireWoods LLP
800 East Canal Street
Richmond, VA 23219
(804) 775-1000
Facsimile: (804) 775-1061
Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed via the Court's ECF system on December 8, 2017, which will then send a notification of electronic filing (NEF) to the attorneys of record.

/s/

Bryan A. Fratkin (VSB No. 38933)
bfratkin@mcguirewoods.com
Heidi E. Siegmund (VSB No. 89569)
hsiegmund@mcguirewoods.com
McGuireWoods LLP
Gateway Plaza
800 East Canal Street
Richmond, VA 23219
(804) 775-1000
Facsimile: (804) 775-1061
Counsel for Defendant